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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARCO BORGRA, *et al.*,

: 07 Civ. 5807 (TPG)

Plaintiffs,

-against-

**DECLARATION OF
REGINA ALTER**

THE REPUBLIC OF ARGENTINA,

Defendant.

REGINA ALTER makes the following declaration, under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am of counsel with the firm of Dreier LLP, counsel of record for plaintiffs. I make this declaration in support of plaintiffs' motions for summary judgment against defendant the Republic of Argentina ("Argentina") and to strike defendant's discovery requests. I have personal knowledge of the facts and circumstances set forth below.

2. Annexed hereto as Exhibit 1 is a true and correct copy of the Complaint in this case, dated June 19, 2007.

3. Annexed hereto as Exhibit 2 is a true and correct copy of defendant's Answer to the Complaint, dated August 20, 2007.

4. Annexed hereto as Exhibit 3 is a true and correct copy of Defendant's First Request for the Production of Documents, dated August 20, 2007.

5. Annexed hereto as Exhibit 4 is a true and correct copy of Plaintiffs' Responses and Objections to Defendant's First Request for the Production of Documents, dated August 27, 2007.

6. Annexed hereto as Exhibit 5 is a true and correct copy of the opinion entitled *Allan Applestein TTEE FBO D.C.A. Grantor Trust v. The Republic of Argentina*, No. 02 Civ. 4124, 2003 WL 22743762 (S.D.N.Y. Nov. 20, 2003) (the "DCA Decision").

7. Annexed hereto as Exhibit 6 is a true and correct copy of the opinion entitled *EM Ltd. v. The Republic of Argentina*, No. 03 Civ. 2507 (TPG), 2003 WL 22120745 (S.D.N.Y. Sept. 12, 2003), as amended by 2003 WL 22454934 (S.D.N.Y. Oct. 27, 2003), *aff'd*, 382 F.3d 291 (2d Cir. 2004) (the "EM Ltd. Decision").

8. Annexed hereto as Exhibit 7 is a true and correct copy of the opinion entitled *Lightwater Corp. Ltd. v. The Republic of Argentina*, No. 02 Civ. 3804, 02 Civ. 3808, 02 Civ. 5932 (TPG), 2003 WL 1878420 (S.D.N.Y. Apr. 14, 2003) (the "Lightwater Decision").

9. Annexed hereto as Exhibit 8 is a true and correct copy of the opinion entitled *Mazzini v. The Republic of Argentina*, No. 03 Civ. 8120 (TPG), 2005 WL 743090 (S.D.N.Y. March 31, 2005) (the "Mazzini Decision").

10. Annexed hereto as Exhibit 9 is a true and correct copy of the transcript from the hearing before the Court on March 28, 2006 in the action entitled *Cilli v. The Republic of Argentina*, 04 Civ. 6594 (TPG).

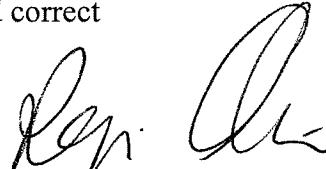
11. Annexed hereto as Exhibit 10 is a true and correct copy of the opinion entitled *Mazoral v. The Republic of Argentina*, No. 04 Civ. 3313 (TPG), Slip Op. (S.D.N.Y. May 4, 2006) (the "Mazoral Decision").

12. Annexed hereto as Exhibit 11 is a true and correct copy of a transcript from the hearing before the Court on March 5, 2004.

WHEREFORE, it is respectfully requested that plaintiffs' motions be granted in their entirety.

Dated: New York, New York
January 31, 2008

I declare under penalty of perjury that the foregoing is true and correct



Regina Alter